1 The Honorable John C. Coughenour 2 3 4 5 UNITED STATES DISTRICT COURT 6 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 7 UNITED STATES OF AMERICA, 8 No. CR19-259 JCC 9 Plaintiff, STIPULATED MOTION TO EXTEND 10 v. REPORT DATE 11 RYAN HERNANDEZ, **Note for Consideration:** 12 January 12, 2021 Defendant. 13 Defendant, Ryan Hernandez, by his undersigned counsel, respectfully moves the Court to 14 15 extend the date by which he must report to Bureau of Prisons ("BOP") custody to a date no earlier 16 than February 15, 2021. The government, by Assistant United States Attorney Steven Masada, 17 stipulates to this extension. 18 The BOP has set Mr. Hernandez's report date for January 15, 2021. However, Mr. 19 Hernandez requires further evaluation of a potentially serious health condition, as set forth in the 20 attached letters from his medical providers (Exhibit 1). As reflected in these letters, Mr. 21 Hernandez requires additional testing to determine the seriousness of the situation and to 22 determine the best course of treatment. Defense counsel submit that it would be in the interest of 23 both Mr. Hernandez and the Bureau of Prisons to resolve these issues prior to Mr. Hernandez 24 25 STIPULATED MOTION TO EXTEND REPORT BLACK & ASKEROV, PLLC

DATE (Ryan Hernandez; No. CR19-259 JCC) - 1

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reporting to serve his sentence. For these reasons, the parties stipulate that the Court should enter 1 an order extending Mr. Hernandez's report date to a date no earlier than February 15, 2021. 2 Respectfully submitted this 12th day of January, 2021. 3 LAW OFFICE OF SARA L. CAPLAN 4 5 s/ Sara L. Caplan Sara L. Caplan 6 Attorney for Ryan Hernandez Law Office of Sara Caplan 7 3550 Wilshire Blvd. #1130 Los Angeles, CA 90010 8 Phone: 310.550.5877 Email: saralcaplan@gmail.com 9 10 BLACK & ASKEROV, PLLC 11 s/ Christopher Black 12 Christopher Black Attorney for Ryan Hernandez 13 Black & Askerov, PLLC 705 Second Avenue, Suite 1111 14 Seattle, WA 98104 15 Phone: 206.623.1604 Fax: 206.658.2401 16 Email: chris@blacklawseattle.com 17 18 s/ Steven Masada 19 Steven Masada Assistant United States Attorney 20 21 22 23 24 25

STIPULATED MOTION TO EXTEND REPORT DATE (*Ryan Hernandez*; No. CR19-259 JCC) - 2

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